

HEWLETT-PACKARD COMPANY  
Intellectual Property Administration  
P.O. Box 272400  
Fort Collins, Colorado 80527-2400

PATENT APPLICATION

ATTORNEY DOCKET NO. 200208087-1

IN THE  
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Brian James DeHamer et al.

Confirmation No.: 2983

Application No.: 10/652,988

Examiner: Vo, Ted T.

Filing Date: August 29, 2003

Group Art Unit: 2191

Title: Web Presentation Architecture that Supports Page Navigation Management

Mail Stop Appeal Brief - Patents  
Commissioner For Patents  
PO Box 1450  
Alexandria, VA 22313-1450

TRANSMITTAL OF REPLY BRIEF

Transmitted herewith is the Reply Brief with respect to the Examiner's Answer mailed on July 9, 2008.

This Reply Brief is being filed pursuant to 37 CFR 1.193(b) within two months of the date of the Examiner's Answer.

(Note: Extensions of time are not allowed under 37 CFR 1.136(a))

(Note: Failure to file a Reply Brief will result in dismissal of the Appeal as to the claims made subject to an expressly stated new ground rejection.)

No fee is required for filing of this Reply Brief.

If any fees are required please charge Deposit Account 08-2025.

☒ I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to:  
Commissioner for Patents, Alexandria, VA 22313-1450  
Date of Deposit: September 9, 2008

OR

☐ I hereby certify that this paper is being transmitted to the Patent and Trademark Office facsimile number (571) 273-8300.  
Date of facsimile:

Typed Name: Katey P. Hines

Signature: 

Respectfully submitted,

Brian James DeHamer et al.

By 

Michael G. Fletcher

Attorney/Agent for Applicant(s)

Reg No. : 32,777

Date : September 9, 2008

Telephone : 281-970-4545



HEWLETT-PACKARD COMPANY  
Intellectual Property Administration  
P.O. Box 272400  
Fort Collins, Colorado 80527-2400

PATENT APPLICATION

ATTORNEY DOCKET NO. 200208087-1

IN THE  
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Brian James DeHamer et al.

Confirmation No.: 2983

Application No.: 10/652,988

Examiner: Vo, Ted T.

Filing Date: August 29, 2003

Group Art Unit: 2191

Title: Web Presentation Architecture that Supports Page Navigation Management

Mail Stop Appeal Brief - Patents  
Commissioner For Patents  
PO Box 1450  
Alexandria, VA 22313-1450

TRANSMITTAL OF REPLY BRIEF

Transmitted herewith is the Reply Brief with respect to the Examiner's Answer mailed on July 9, 2008.

This Reply Brief is being filed pursuant to 37 CFR 1.193(b) within two months of the date of the Examiner's Answer.

(Note: Extensions of time are not allowed under 37 CFR 1.136(a))

(Note: Failure to file a Reply Brief will result in dismissal of the Appeal as to the claims made subject to an expressly stated new ground rejection.)

No fee is required for filing of this Reply Brief.

If any fees are required please charge Deposit Account 08-2025.

- ☒ I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to:  
Commissioner for Patents, Alexandria, VA 22313-1450

Date of Deposit: September 9, 2008

OR

- ☐ I hereby certify that this paper is being transmitted to the Patent and Trademark Office facsimile number (571) 273-8300.

Date of facsimile:

Typed Name: Katey P. Hines

Signature: 

Respectfully submitted,

Brian James DeHamer et al.

By 

Michael G. Fletcher

Attorney/Agent for Applicant(s)

Reg No. : 32,777

Date : September 9, 2008


Telephone : 281-970-4545



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	§	
Brian James DeHamer et al.	§	Confirmation No.: 2983
	§	
Serial No.: 10/652,988	§	Group Art Unit: 2191
	§	
Filed: August 29, 2003	§	Examiner: Vo, Ted T.
	§	
For: Web Presentation Architecture that	§	Atty. Docket: 200208087-1
Supports Page Navigation Management	§	NUHP:0126/FLE/DOO

Mail Stop Appeal Brief - Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

CERTIFICATE OF TRANSMISSION OR MAILING 37 C.F.R. 1.8	
I hereby certify that this correspondence is being transmitted by facsimile to the United States Patent and Trademark Office in accordance with 37 C.F.R. §1.6(d), or is being transmitted via the Office electronic filing system in accordance with 37 C.F.R. §1.6(a)(4), or is being deposited with the U.S. Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date below:	
September 9, 2008 Date	 Katey Hines

**REPLY BRIEF PURSUANT TO 37 C.F.R. § 41.41**  
**AND IN RESPONSE TO THE EXAMINER'S ANSWER**

This Reply Brief is being filed pursuant to 37 C.F.R. § 41.41 and in response to the Examiner's Answer mailed on July 9, 2008. Specifically, this Reply Brief addresses the Examiner's continuing pattern of misinterpretation of Han et al. ("WebSplitter: A Unified XML Framework for Multi-Device Collaborative Web Browsing", ACM, 2000; hereinafter "the Han reference") and the pending claims. By the present Reply, the Appellants stress previously made arguments and provide additional arguments regarding assertions by the Examiner in the Examiner's Answer. In addition to the present remarks, the Appellants respectfully request that the Board consider the Appellants' complete arguments set forth in the previously-filed Appeal Brief.

***Independent Claims 1, 8, 15, and 18***

As a preliminary matter, Appellants acknowledge that the first, second, and third grounds of rejection (the rejections under Section 101, Section 112 first paragraph, and Section 112 second paragraph, respectively) have been vacated by the Examiner. As such, this Reply Brief will not address any previous issues with regard to the first, second, or third grounds of rejection. Indeed, the present Reply Brief will only address issues with respect to the fourth ground of rejection under Section 102(b).

First, Appellants note that the similar claim language found in independent claims 1, 8, and 15 was argued together in the Revised Appeal Brief. *See* Revised Appeal Brief, pages 15-16. Independent claims 1, 8, and 15 include similar language not disclosed in the prior art of record or addressed by the Examiner. Independent claims 1 and 15 are directed to a system *for creating web applications*. Similarly, independent claim 8 is directed to a method of creating web applications. As pointed out in the Revised Appeal Brief, the Han reference fails to disclose a system or method for creating web applications. *See* Revised Appeal Brief, page 19.

Indeed, the Han reference is not directed to a system or method for *creating* web applications, but rather to a system and method for granting partial *access* to an *already existing* web application. *See* Han, page 226, col. 1, lines 3-7 and 9-12. The Han reference describes an example of this method, whereby a lecturer may be able to control a web presentation via a PDA, view a second version of the presentation on a personal

laptop, and have a third version of the presentation available to members of an audience. See Han, page 222, col. 1, lines 4-20. Thus, the Han reference is directed to the *access* of an *existing* web application and, more specifically, to the partitioned access of an existing web application. Accessing an existing web application is simply not analogous to a system and method for *creating* web applications recited in independent claims 1, 8, and 15.

The Examiner failed to address the deficiency of the Han reference with respect to the creation of a web application, as recited in independent claims 1, 8, and 15, instead focusing exclusively on independent claim 18. See Examiner's Answer, page 4, lines 5-9. Accordingly, because the Examiner has failed to address these recitations of independent claims 1, 8, and 15, Appellants respectfully request reversal of the Examiner's Section 102 rejection and allowance of claims 1, 8, and 15, as well as all claims dependent thereon.

Second, with respect to independent claims 1, 8, 15, and 18, the Examiner asserted that:

Han discloses a server, a proxy, and a plurality of computers connected to the server via Proxy, where web presentations are stored as URLs in the server. Each computer includes a browser. There are computers from Session presenter/lecturer and from Students. Figure 5, a browser of a Session creator (or Lecturer) includes a session login menu and a user login menu (described in sec. 3.3, p. 227). In the session login menu, it includes requesting a session name and URL (i.e. *user's intended destination*). See p. 226, sec. 3.1:

Figure 5 summarizes the steps involved in establishing a multi-device collaborative browsing session in a WebSplitter proxy. The proxy

registers itself (1) to the service discovery database so that a client can find the proxy (2). Next, the session creator clicks on the desired proxy's hyperlink (3) and the proxy returns a session login menu requesting the session name and URL of the first XML Web page (4) (*users intended destination/ save's user intended destination*). Then, the proxy pulls the requested XML page (5) and its associated policy file (6) into the proxy. The proxy parses the XML page and policy file to create privilege groups (7), then sends to the session creator a login menu requesting username and password (8) (*upon completion of the prerequisite*). After matching the session creator to a privilege group (the prerequisite), the proxy announces the new session to the service directory and requests any devices registered by the session creator (9). Finally, the portion of the requested XML page that the session creator is permitted to receive is returned to the session creator (10) (*subsequently recall that information to redirect the user back to the intended destination upon completion of the prerequisite*).

The italics within the parentheses are the claimed limitations mapped to the steps in Figure 5, p. 226, which are processed by the lecturer or session creator.

Examiner's Answer, pages 6-7. (Emphasis original).

As seen above, the Examiner referenced a portion of the Han reference that describes splitting a web browsing session into multiple views, whereby a particular retrieved view corresponds to a login and password information. Indeed, the Han reference specifically describes parsing a XML page with corresponding views according to created privilege groups. See Han, page 223, col. 1, lines 3-14 and page 226, col. 1, lines 35-38. Thereafter, when a user attempts to access a XML page, the proxy determines what view will be presented to a user, based on the login information. See Han, page 226, col. 1, lines 43-45.

Contrast this with the recitations of independent claims 1, 8, 15, and 18, whereby stored information is recalled to *redirect* the user *back* to an intended destination, which the Han reference fails to describe. Instead, in the Han reference, the proxy may determine which destination a user is to view (based on the user's access privileges). Thus, regardless of the intended destination of the user (e.g. a given XML page), the proxy merely *directs* the user to a particular view (a portion) of the intended destination corresponding to the user's access privileges, but not to the intended destination itself (the entire XML page). *See* Han, page 224, col. 2, lines 6-11. Therefore, regardless of the *intended* destination of the user, the *actual* destination, i.e. the allowed particular view or portion of the XML page, that the user is to view is not determined until the *after* the login has been processed by the proxy. *See* Han, page 226, col. 1, lines 43-45.

Therefore, the system described in the Han reference cannot be read to describe redirecting a user *back* to an intended destination. Rather, the system described in the Han reference, at best, determines an *actual* (allowed) destination out of a group of possible destinations and *directs* the user to that *actual* (allowed) destination. *Redirecting* a user *back* to an intended destination, as recited in independent claims 1, 8, 15, and 18, requires the system to know what the intended destination will be. Otherwise the system cannot redirect the user *back* to that destination. Because the Han reference specifically describes a system where the destination is unknown at the time of login, the system cannot be said to effectuate a redirect *back* to an unknown destination. Thus, the

system of the Han reference fails to describe *redirecting* a user *back* to an intended destination, as recited in independent claims 1, 8, 15, and 18.


Accordingly, for at least the reasons set forth above the Appellants respectfully request favorable consideration of the application and the reversal of the Examiner's final rejection of independent claims 1, 8, 15, and 18, as well as all claims depending therefrom.

**Conclusion**

The foregoing are only reiterative points regarding the reasons why the pending claims are allowable. Appellants rely upon all of the reasons advanced in the Appeal Brief, and respectfully request that the Board carefully review the claims in view of these arguments and indicate the allowability of the claimed subject matter.

Respectfully submitted,

Date: September 9, 2008

  
\_\_\_\_\_  
Michael G. Fletcher  
Reg. No. 32,777  
(281) 970-4545

**CORRESPONDENCE ADDRESS:**  
**HEWLETT-PACKARD COMPANY**  
Intellectual Property Administration  
Post Office Box 272400  
Fort Collins, Colorado 80527-2400